

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

**FEMHEALTH USA, INC., d/b/a  
CARAFEM,**

**Plaintiff,**

**v.**

**RICKEY NELSON WILLIAMS, JR.;  
BEVELYN Z. WILLIAMS;  
EDMEE CHAVANNES; OPERATION  
SAVE AMERICA; JASON STORMS;  
CHESTER GALLAGHER; MATTHEW  
BROCK; COLEMAN BOYD; FRANK  
LINAM; BRENT BUCKLEY; and AJ  
HURLEY,**

**Defendants.**

**Civil Action No. \_\_\_\_\_**

**DECLARATION OF SARAH B. MILLER  
IN SUPPORT OF EMERGENCY MOTION FOR TEMPORARY  
RESTRAINING ORDER**

I, Sarah B. Miller, being duly sworn, do hereby depose and state as follows:

1. I am an attorney at Bass, Berry & Sims, PLC, 150 Third Avenue South, Suite 2800, Nashville, Tennessee 37201, and our firm represents FemHealth USA, Inc. d/b/a carafem (“Plaintiff”).

2. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.

3. As explained in the Complaint, Motion for Temporary Restraining Order, and accompanying statements and other documents, Defendants in this action, who are believed to be

currently threatening Plaintiff's staff, and/or other healthcare providers, present a an active and substantial threat to the safety Plaintiff's staff and patients, the very people this action is intended to protect.

4. For this reason, Plaintiff's counsel, who is unaware of the existence of counsel representing any Defendant, cannot locate and serve the Defendants in this actively threatening situation without danger of escalating their threats and violence.

5. Accordingly, pursuant to Fed. R. Civ. P. 65(b)(1) Plaintiff's counsel asks the Court to determine that notice is not required and to issue a temporary restraining order without notice to the adverse party to protect against the immediate and irreparable injury imminently posed by Defendants.

Date: July 29, 2022

/s/ Sarah B. Miller

Sarah B. Miller

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*Attorney for Plaintiff*